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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

16 CHASOM BROWN, MARIA NGUYEN,
WILLIAM BYATT, JEREMY DAVIS, and
17 CHRISTOPHER CASTILLO, individually
and on behalf of all similarly situated,

18 Plaintiffs,

19 v.

20 GOOGLE LLC,
21 Defendant.

Case No. 5:20-cv-03664-LHK

**DECLARATION OF VIOLA TREBICKA
IN SUPPORT OF JOINT STIPULATION
AND [PROPOSED] ORDER EXTENDING
TIME FOR SUBMITTING [PROPOSED]
STIPULATED PROTECTIVE ORDER
AND [PROPOSED] STIPULATED
ORDER GOVERNING DISCOVERY OF
ELECTRONICALLY STORED
INFORMATION**

Judge: Honorable Lucy H. Koh

1 I, Viola Trebicka, declare as follows:

2 1. I am a partner in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP and counsel
3 of record for Defendant Google LLC (“Google”) in the above-captioned matter. I am a member in
4 good standing of the state bar of California and admitted to practice in this Court. I make this
5 declaration based on personal knowledge and, if called upon to do so, could testify competently
6 thereto.

7 2. I submit this declaration in support of the Joint Stipulation And [Proposed] Order
8 Extending Time For Submitting [Proposed] Stipulated Protective Order And [Proposed] Stipulated
9 Order Governing Discovery Of Electronically Stored Information.

10 3. Google started the meet and confer process on September 1, 2020 by sending to
11 counsel for Plaintiffs its proposed drafts of the [Proposed] Stipulated Protective Order (“Protective
12 Order”) and [Proposed] Stipulated Order Governing Discovery of Electronically Stored Information
13 (“ESI Order”).

14 4. Since that date, counsel for both parties have met and conferred in good faith on both
15 the Protective Order and the ESI Order and have attempted to find compromises on disputed items.

16 5. The parties believe that we are close to resolving all or most issues, and that an extra 10
17 days will allow us to resolve or at least narrow any outstanding disagreement.

18 6. There have been no previous requests to extend this deadline.

19 7. This extension will not affect any other case deadlines.

20 I declare under penalty of perjury of the laws of the United States that the foregoing is true and
21 correct. Executed in Los Angeles, California on October 1, 2020.

22
23 /s/ Viola Trebicka

24 Viola Trebicka
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